

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

CASE NO: 21-CR-20443

Plaintiff,

v.

Hon. Stephanie Dawkins Davis
United States District Judge

AMIR J. BROWN,

Defendant.

The United States of America's Sentencing Memorandum

Amir Brown pleaded guilty to being a felon in possession of a firearm. Though he is a young man, Brown has a troubling criminal history which includes convictions and arrests for violent crimes involving firearms. Brown was on both probation and bond at the time of his offense. Brown's sentencing guideline range is 30-37 months. Based on the sentencing factors in 18 U.S.C. § 3553(a) and pursuant to the Rule 11 plea agreement, the government recommends a sentence of 37 months.

Several sentencing factors are significant in this case. First, the Court should impose a sentence that promotes respect for the law. When Brown committed the offense in this case he was on probation for a robbery conviction (PSR ¶ 28) and on bond for firearms and assault charges (PSR ¶ 34). Brown's possession of a firearm while under court supervision demonstrates a lack of respect for the law and justifies

a substantial custodial sentence.

Second, the court should impose a sentence that adequately deters Brown and other from committing firearm offenses. Brown has seen firsthand the tragic results of gun violence. He has lost family and friends, and he was shot at a very young age. (PSR ¶¶ 51 & 53). But Brown's experiences have not deterred him from illegally possessing firearms. Similarly, Brown's prior sentences have failed to deter him from committing additional crimes, even while he was under court supervision. The Court's sentence in this case should be long enough to adequately deter Brown from committing future crimes—especially violent crimes or gun crimes.

Last, there is a significant need for the sentence to protect the public. Brown's criminal history reflects violent incidents involving Brown's use of firearms, including Brown's robbery conviction (PSR ¶ 28) and the pending charge for assault with intent to murder which involved shots being fired at a police officer's patrol vehicle (PSR ¶ 35). This conduct poses a serious danger to the public and a lengthy custodial sentence is required to keep the public safe.

A thirty-seven month sentence is warranted in this case.

Respectfully Submitted,

Dated: April 12, 2022

DAWN N. ISON
United States Attorney

/s/ Jules M. DePorre

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CERTIFICATE OF SERVICE

I certify that on April 12, 2022, an employee of the United States Attorney's Office filed the foregoing document using the Court's CM/ECF system, which will send notice to all parties.

s/ JULES M. DePORRE
Assistant U.S. Attorney